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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>IN RE:</b>	§	
	§	
<b>DHILLON GROUP, LLC,</b>	§	<b>CASE NO: 12-40163</b>
	§	
<b>Debtor</b>	§	<b>CHAPTER 11</b>

**RESPONSE TO UNITED CENTRAL BANK'S MOTION FOR RELIEF FROM STAY AS  
TO REAL AND PERSONAL PROPERTY LOCATED AT 2909 MICHELLE DR.,  
SHERMAN, TEXAS (HOLIDAY INN EXPRESS) AND WAIVER OF THIRTY-DAY  
HEARING REQUIREMENT**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Dhillon Group, LLC, Debtor in the above styled and numbered bankruptcy proceeding and files this its response to United Central Bank's (the "Movant") Motion for Relief from Stay as to Real and Personal Property Located at 2909 Michelle Dr., Sherman Texas (Holiday Inn Express) and Waiver of Thirty-Day Hearing Requirement (the "Motion") and would respectfully show the Court as follows:

**SPECIFIC ADMISSIONS**

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor cannot admit or deny the allegations contained in paragraph 3 of the Motion, as the document speaks for itself.

4. Debtor cannot admit or deny the allegations contained in paragraph 4 of the Motion, as the documents speak for themselves.
5. Debtor cannot admit or deny the allegations contained in paragraph 5 of the Motion, as the documents speak for themselves.
6. Debtor cannot admit or deny the allegations contained in paragraph 6 of the Motion, as the document speaks for itself.
7. Debtor admits the allegations contained in the first sentence of paragraph 7 of the Motion but cannot admit or deny the remainder of the paragraph, as the documents speak for themselves.
8. Debtor admits the allegations contained in sentences 1 and 3 of paragraph 8 of the Motion. Debtor denies the allegations contained in sentence 2 of paragraph 8 of the Motion. Debtor cannot admit or deny the allegations contained in sentence 4 of paragraph 8 of the Motion, as the documents speak for themselves but does admit the scheduled amount of \$403,000. Debtor cannot admit or deny the allegations contained in sentence 5 of paragraph 8 of the Motion, as the documents speak for themselves. Debtor denies the allegations contained in sentence 6 of paragraph 8 of the Motion.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.
10. Debtor denies the allegations contained in paragraph 10 of the Motion.
11. Debtor denies the allegations contained in paragraph 11 of the Motion.
12. Debtor denies the allegations contained in paragraph 12 of the Motion.
13. Debtor denies the allegations contained in paragraph 13 of the Motion.
14. Debtor denies the allegations contained in paragraph 14 of the Motion.

**STATEMENT OF ADEQUATE PROTECTION**

15. The Property is necessary for reorganization.
16. Debtor will file a Plan of Reorganization and Disclosure Statement.
17. The Property is insured, and Debtor will maintain insurance on the Property.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the Court deny the Motion and relief requested and grant the Debtor such other and further relief to which it may show itself entitled.

Dated: February 17, 2012

Respectfully Submitted,  
/s/ Arthur I. Ungerman  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 17, 2012 a true and correct copy of the foregoing document was forwarded via electronic filing to those persons receiving electronic notice or First Class US Mail to the following:

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/s/ Arthur I. Ungerman  
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